

# **EXHIBIT 3**

## **City of Chicago's Response to United States' April 2020 Request for Information**



DEPARTMENT OF LAW  
CITY OF CHICAGO

June 1, 2020

**VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY**

**PERSONAL AND CONFIDENTIAL**

Hector F. Ruiz, Jr.  
United States Department of Justice  
Civil Rights Division  
Employment Litigation Section, PHB  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

**Re: United States v. Albrecht, Civil Action 80 C 1590**

Dear Mr. Ruiz:

I am writing in response to your letter dated April 24, 2020, in which you indicated that the Department of Justice is evaluating the progress made by the City of Chicago toward achieving the long-range goal in the Albrecht Consent Decree. As you noted, under the Decree, the City of Chicago as a long range goal, "shall seek to promote black and Hispanic persons in sufficient numbers so as to increase substantially the minority composition in each of the promotional ranks of the City of Chicago Fire Department with the objective that each such rank become more representative of the racial and ethnic composition of the rank or ranks from which promotion to it are made."

In your letter, you asked the City of Chicago ("the City") to provide the following information. The City's response follows each request.

*Request No. 1*

"Please provide data on the incumbent mix (by race and ethnicity) of the Chicago Fire Department for the ranks of Firefighter, Engineer, Lieutenant, Captain and Battalion Chief as it existed on March 31, 2020."

*Response:*

The information requested is provided in Exhibit A, which accompanies this letter.

*Request No. 2*

“Please describe any training opportunities provided to personnel seeking promotion with the CFD as described in section 3(E) of the Decree.”

*Response:*

The information requested is provided in Exhibit B, which accompanies this letter.

*Request No. 3*

“Please have the appropriate person review and confirm the accuracy of the below description of the City of Chicago Fire Department:

The Chicago Fire Department is the largest fire department in the mid-west United States, and is made up of more than 5,000 uniformed personnel. The uniformed personnel are spread amongst several bureaus in the CFD, including the Bureau of Operations, Bureau of Employee Relations, Bureau of Fire Prevention, and Bureau of Administrative Services.

The vast majority of uniformed personnel (more than 4,500) are assigned to one of four divisions in the Bureau of Operations: (1) Fire Suppression and Rescue; (2) Emergency Medical Services; (3) Special Operations; or (4) the Office of Fire Investigations. The Bureau of Operations receives more than 500,000 calls per year for emergency assistance, and responds to fires, medical emergencies, hazardous material incidents and other emergency situations to ensure the safety and well-being of the City’s residents and visitors. The remaining Bureaus are responsible for, among other things, overseeing contractual agreements between the City of Chicago and uniformed and civilian employees represented by collective bargaining unit agreements (Bureau of Employee Relations), overseeing the day-to-day administration of the City’s personnel rules and regulations (Bureau of Administrative Services), and protecting the citizens of Chicago against the loss of life and property through its enforcement of the municipal fire codes (Bureau of Fire Prevention).

The uniformed ranks in the City’s Fire Department include Firefighter, Engineer, Lieutenant, Captain, and Battalion Chief. Firefighter is the entry-level position at the CFD. Firefighters can seek promotion to either Engineer or Lieutenant, as a first promotion. Engineers can seek promotion to Lieutenant. Lieutenants can seek promotion to Captain, and Captains can seek promotion to Battalion Chief. Battalion Chief is the highest-ranking promotional career position that can be achieved at the CFD. As the highest-ranking officers within the CFD, Battalion Chiefs are responsible for supervising all fire prevention and suppression activities.”

*Response:*

The above description is updated in Exhibit C, which accompanies this letter.

Please feel free to contact me if you have any questions or require additional information.

Very truly yours,

A handwritten signature in blue ink that reads "David J. Seery". To the right of the signature is a small blue oval containing the letters "JF".

David J. Seery  
Deputy Corporation Counsel  
Administration  
City of Chicago, Department of Law  
121 N. LaSalle Street, Room 600  
Chicago, Illinois 60602  
(312) 744-2825

Enclosures

US003

**Exhibit A**

## Fire Department

Career Service Rank	White	Black	Hispanic	Asian	Native American	Two or More Races Identified	Native Hawaii	Total
Battalion Chief	96	30	3	0	0	0	0	129
Captain	157	20	17	1	2	0	0	197
Lieutenant	390	73	66	6	2	0	0	537
Engineer	317	83	52	7	1	0	0	460
Firefighter	1587	457	523	40	1	4	4	2616
<b>Total</b>	<b>2547</b>	<b>663</b>	<b>661</b>	<b>54</b>	<b>6</b>	<b>4</b>	<b>4</b>	<b>3939</b>

**Exhibit B**

The Fire Department provides significant training opportunities for career development to all who seek them. There are four primary methods by which the Department provides these opportunities to its members: 1) Department-offered training (off duty); 2) In-service or on-duty training; 3) Educational reimbursement; and 4) Announcements of outside training opportunities. The following is a sample of the courses considered for career development, each of which provides training/certification on skills utilized by all Fire Department officers (Lieutenants, Captains, and Battalion Chiefs) and would help them prepare for all promotional examinations:

- Office of the State Fire Marshal Fire Service (OSFM) Instructor 1
- OSFM Instructor 2
- OFSM Advanced Technician Firefighter (ATF)
- Vehicle and Machinery Operations (VMO)
- Fire Service Vehicle Operator (FSVO)
- Company Fire Officer (Fire Officer 1)

The OSFM Instructor 1 and Instructor 2 are currently being provided in the training academy after members are selected for promotion to lieutenant<sup>1</sup>. However, members interested in getting a leg up prior to the promotional examinations are provided multiple opportunities to take these classes earlier. Specifically, the Fire Department provides the 40-hour OSFM Instructor 1 and 2 classes free-of-charge multiple times a year. OFSM Instructor 1 and 2 classes are also offered by several community colleges in the Chicago area and members who take these classes are eligible for tuition reimbursement. Lastly, the Fire Department routinely informs its members of the opportunity to receive OSFM Instructor 1 and 2 courses from the following private companies at their own expense: Illinois Fire Service Institute (IFSI) and the Northeastern Illinois Public Safety Training Academy (NIPSTA).

Similar to OSFM Instructor 1 and 2, the Advanced Technician Firefighter (ATF) certification contains skills required for all officer-level positions in the Fire Department. The ATF curriculum is given through the Fire Department's daily drills and documented through the In-Service Training Records (ITR) on the Fire Department's intranet site. After the member has three years in the field and has completed the ITRs, the member can take the state examination for certification. To be granted the ATF certification, members must also be certificated in VMO and FSVO. FSVO is offered several times per year by the Fire Department and VMO is offered through both the Fire Department and IFSI several times per year.

Lastly, Company Fire Officer (CoFO) is scheduled to be provided in future lieutenant promotional classes. CoFO is offered by several suburban community colleges and is available for tuition reimbursement by the Department.

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<sup>1</sup> On future promotional opportunities, OSFM Instructor 1 and 2 will be perquisites for promotion to Lieutenant, Captain, and Battalion Chief.

**Exhibit C**

The Chicago Fire Department is the largest fire department in the midwest United States, and is made up of approximately 5,000 uniformed personnel. The uniformed personnel are spread amongst several bureaus in the CFD, including the Bureau of Operations, Bureau of Logistics, Bureau of Fire Prevention, and Bureau of Administrative Services. The vast majority of uniformed personnel (approximately 4,500) are assigned to one of four divisions in the Bureau of Operations: (1) Fire Suppression and Rescue; (2) Emergency Medical Services; (3) Special Operations; or (4) the Office of Fire Investigations. The Bureau of Operations receives approximately 600,000 calls per year for emergency assistance, and responds to fires, medical emergencies, hazardous material incidents and other emergency situations to ensure the safety and well-being of the City's residents and visitors. The remaining Bureaus are responsible for, among other things, overseeing contractual agreements between the City of Chicago and uniformed and civilian employees represented by collective bargaining unit agreements (Bureau of Administrative Services), overseeing the day-to-day administration of the City's personnel rules and regulations (Bureau of Administrative Services), providing maintenance, logistical support and supplies to the uniformed personnel (Bureau of Logistics), and protecting the citizens of Chicago against the loss of life and property through its enforcement of the municipal fire codes (Bureau of Fire Prevention). The uniformed ranks in the City's Fire Department include Firefighter, Engineer, Lieutenant, Captain, and Battalion Chief. Firefighter is the entry-level position at the CFD. Firefighters can seek promotion to either Engineer or Lieutenant, as a first promotion. Engineers can seek promotion to Lieutenant. Lieutenants can seek promotion to Captain, and Captains can seek promotion to Battalion Chief. Battalion Chief is the highest-ranking promotional career position that can be achieved at the CFD. As the highest-ranking officers within the CFD, Battalion Chiefs are responsible for supervising all fire prevention and suppression activities.